

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DEFENDANTS' MOTION FOR LEAVE TO SUPPLEMENT RECORD

COME NOW Sheriff Terry Wilson and Lieutenant David Stover, the Defendants in the above-styled cause, and submit this Motion for Leave to Supplement their Special Report with additional documents from the Plaintiff's inmate file. As grounds for so moving the Defendants state as follows:

1. Defendants filed their Special Report on October 8, 2007.
2. Attached as Exhibit E to the Special Report was a copy of the Plaintiff's inmate file. The records in Exhibit E were current at the time of the filing of the Special Report.
3. Since October 8, 2007, the Plaintiff has received additional medical treatment, and he has been the subject of various disciplinary reports, all of which is reflected in the additional records in the Plaintiff's inmate file. These records have a direct bearing on the validity of the claims in the Plaintiff's Complaint.
4. Attached to this Motion are all the additional documents that have been placed in the Plaintiff's inmate file to date since the filing of the Defendants' Special Report, including all medical records, all inmate requests, all grievance forms,¹ and all disciplinary reports. These

¹ Notably, as discussed in the Special Report, the Plaintiff has failed to file a single grievance form, as required by the Coosa County Jail grievance policy, regarding *any claim in his Complaint*.

documents should supplement the documents attached to Exhibit E of the Defendants' Special Report.

5. The Plaintiff will not be prejudiced by this supplementation.

WHEREFORE, PREMISES CONSIDERED, the Defendants respectfully request that this Court grant their Motion for Leave to Supplement the Record by supplementing Exhibit E to their Special Report with the documents attached to this Motion as Exhibit A.

Respectfully submitted this 29th day of January, 2008.

s/Joseph L. Hubbard, Jr.
JOSEPH L. HUBBARD, JR., Bar Number HUB015
Attorney for Defendants
WEBB & ELEY, P.C.
7475 Halcyon Pointe Drive (36117)
Post Office Box 240909
Montgomery, Alabama 36124
Telephone: (334) 262-1850
Fax: (334) 262-1889
E-mail: jhubbard@webbeley.com

CERTIFICATE OF SERVICE

I hereby certify that on this the 29th day of January, 2008, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and that I have mailed a true and correct copy of the foregoing by United States Mail, postage prepaid, to the following non-CM/ECF participant:

James Earle Crenshaw
Coosa County Jail
P. O. Box 279
Rockford, Alabama 36420

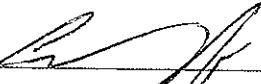
s/Joseph L. Hubbard, Jr.
OF COUNSEL

EXHIBIT A

RELEASE PROCEDURE CHECKLIST

NOTE: ANY INDIVIDUAL BEING RELEASED ON DOMESTIC VIOLENCE AND OR CRIMES AGAINST ANOTHER PERSON IS TO HAVE CONDITIONS OF RELEASE FORM FILLED OUT.

<input checked="" type="checkbox"/>	RELEASE FROM BLOODHOUND. (MAKE SURE INMATE TURNS IN ALL JAIL PROPERTIES).
<input checked="" type="checkbox"/>	TAKE OUT OF BOOKING BINDER (GREEN JAIL BOOK).
<input checked="" type="checkbox"/>	COPIES OF BOND, RELEASE ORDERS AND/OR RECEIPTS FROM THE CLERK'S OFFICE PLACED IN THEIR FOLDER AND ORIGINALS PLACED IN JAIL PAPERWORK BASKET.
<input checked="" type="checkbox"/>	JAIL RELEASE FORM FILLED OUT AND PLACED IN THE JAIL PAPERWORK BASKET.
<input checked="" type="checkbox"/>	PLACE CONDITIONS OF RELEASE AND/OR SEX OFFENDER FORM IN FOLDER (IF REQUIRED).
<input checked="" type="checkbox"/>	SENT TO OFFICE (JOAN OR SHEILA) TO TAKE MONIES OFF BOOKS.

CO'S SIGNATURE: 

DATE: 01/25/18

PLACE CHECKLIST ON LEFT SIDE OF BOOKING FOLDER.

PATIENT HISTORY REPORT

Coosa County Family Dentistry

Date: 01/08/2008

Page: 1

Patient Name:	James E Crenshaw P. O. Box 10 Rockford, AL 35136	Chart Number: CR0060
		Billing Type: 1

DATE	TEETH	DESCRIPTION	PATIENT	CHARGE	PAYMENT	BALANCE
12/30/2007		Patient Balance Forward	James	0.00		0.00
01/08/2008	15	Intraoral-periapical-1st film	James	15.00		15.00
01/08/2008	15	Extraction -single tooth	James	85.00		100.00

TOTAL PATIENT BALANCE AS OF 01/08/2008:

100.00

COOSA COUNTY JAIL
INMATE DISCIPLINARY REPORT
(PLEASE PRINT ALL INFORMATION)

NAME OF INMATE: CRENSHAW, J DATE: 10/31/07

DATE: 10/31/07

DATE OF OCCURRENCE: 10/31/07

CORRECTION OFFICER ON DUTY: COWART / MANCIL

INCIDENT: CRENshaw had his matut banging it on the floor, Mancu advised him to quit.

- Mats aren't allowed in the dayroom -

RECEIVED BY: Mill DATE: 1/3/8

REVIEWED BY:

ADMIN MULL: X LT PEOPLES: _____ SGT JACKSON: _____

DATE:

ACTION TAKEN:

NO visitation for 1 week

P-101

COOSA COUNTY JAIL
REQUEST FORM
(PLEASE PRINT ALL INFORMATION)

NAME OF INMATE: James F. Crenshaw DATE: 12-25-07

PLEASE CHECK ONE OF THE FOLLOWING:

MEDICAL COMMISSARY OTHER

STATE YOUR REQUEST:

I need to go to the dentist.
I have a tooth that needs
to be pull had.

THank you

James Crenshaw

RECEIVED BY: Gordon DATE: 12/25/07

REVIEWED BY:

ADMIN MULL: _____ LT PEOPLES: R DATE: _____

ACTION TAKEN:

Make Appt.

Appt. Made 1/8/08 8:00

INMATE DISCIPLINARY FORM

INMATES NAME: JAMES CRENSHAW / DAVID NORMAN

OFFICER ON DUTY GORDON

DATE OF OCCURANCE: 10/16/07

INCIDENT: AT APPROXIMATELY 2155 HRS. -

I OBSERVED INMATES CRENSHAW AND NORMAN
LOCKED UP WITH EACH OTHER. SOME
PUNCHES WERE THROWN. - THEY WERE IN AND
OUT OF MY LINE OF SIGHT. I TOLD ALL
BLOCKS TO LOCKDOWN AND CALLED CO-
TURNER TO TOWER. - ALTERCATION
ENDED AND I WENT INTO BLOCK
TO QUESTION INMATES. BOTH STATED
THEY WERE HOLLYDAYING AND GOT OUT
OF HAND. NORMAN HAD NO SIGNS OF
INJURY. CRENSHAW HAD A CUT UNDER
EYE ON HIS RIGHT CHEEK. I CLEANED
HIS CUT WITH ALCOHOL AND GAVE HIM
BACITRACIN OINTMENT AND BAND-AIDS. - ALSO
GAVE HIM ICE-PACK FOR SWELLING. - WILL
WATCH HIM PERIODICALLY. - MAY NEED STITCHES.
CRENSHAW STATED HE GOT CUT ON BENCH
IN DAYROOM. -

ACTION TAKEN: RECOMMEND THESE INMATES
BE SEPARATED TOMORROW IN A.M.

REVIEWED BY: _____

OFFICERS SIGNATURE AND CALL NUMBER:

GORDON 2247